

# Exhibit 1

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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Francesca Gino, )  
Plaintiff(s), )  
v. ) Civil Action No. 1:23-cv-11775-MJJ  
President and Fellows )  
of Harvard College et al., )  
Defendant(s). )  
\_\_\_\_\_  
)

[PROPOSED] AMENDED SCHEDULING ORDER

July \_\_\_, 2024

JOUN, D.J.

This Amended Scheduling Order is intended to provide a reasonable timetable for discovery and motion practice in order to help ensure a fair and just resolution of this matter without undue expense or delay.

**Timetable for Discovery and Motion Practice**

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(f), it is hereby ORDERED that:

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this Court's Notice of Scheduling Conference must be completed by **December 4, 2024**.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after **July 25, 2025**.
3. **Fact Discovery - Interim Deadlines.**
  - a. All requests for production of documents and interrogatories must be served by **August 18, 2025**.
  - b. All requests for admission must be served by **September 1, 2025**.

- c. All depositions, other than expert depositions, must be completed by October 20, 2025.
4. **Obligation to Supplement.** Supplemental disclosures under Fed. R. Civ. P. 26(e) shall be made promptly after the receipt of information by the party or counsel and, in any event, no later than the completion of fact discovery, unless good reason can be shown for why such information was not available.
5. **Final Fact Discovery Deadline.** All discovery, other than expert discovery, must be completed by October 20, 2025.
6. **Status Conference.** A status conference will be held on \_\_\_\_\_.
7. **Expert Discovery.**
  - a. Trial experts for the party with the burden of proof must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by October 23, 2025.
  - b. Rebuttal trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by November 17, 2025.
  - c. All trial experts must be deposed by December 5, 2025.
8. **Summary Judgment Motions.**
  - a. Motions for summary judgment must be filed by January 19, 2026.
  - b. Opposition to summary judgment motions are due by February 16, 2026.
  - c. Reply memoranda are due by March 9, 2026.
  - d. Sur-reply memoranda are not permitted.
  - e. In the case of cross-motions, the deadlines and page limits for the filings other than the Plaintiff's initial motion are set forth in the Session's Standing Order Regarding Motion Practice in Section D(2) unless specifically modified.

### **Procedural Provisions**

1. **Extension of Deadlines.** All requests to extend or modify deadlines must be made by motion and must state: (1) the original date(s); (2) the number of previous requests for adjournment or extension; (3) whether these previous requests were granted or denied; (4) the reasons for the requested extension; and (5) whether the opposing party consents and, if not, the reasons given for refusing to consent. The motion shall also contain a summary of the discovery, if any, that remains to be taken, and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend

the pleadings, or file a motion. Motions to extend or modify deadlines will be granted only for good cause shown.

If the requested extension or modification affects any other scheduled dates, a represented party must submit a proposed revised scheduling order using this template. (A *pro se* party may, but is not required to, submit a proposed revised scheduling order.)

Absent an emergency, any request for an extension or adjournment shall be made at least forty-eight hours prior to the deadline or scheduled appearance.

2. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than seven days after the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the Court after the relevant deadline has passed, the Court may enter such additional orders relating to discovery as may be appropriate.
3. **Status Conferences.** The Court has scheduled a status conference after (or close to) the close of fact discovery for case management purposes. Upon request of counsel, or at the Court's own initiative, additional case-management or status conferences may be scheduled.
4. **Early Resolution of Issues.** The Court recognizes that, in some cases, resolution of one or more preliminary issues may remove a significant impediment to settlement or otherwise expedite resolution of the case. Counsel are encouraged to identify any such issues and to make appropriate motions at an early stage in the litigation.
5. **Pretrial Conference.** Lead trial counsel are required to attend any pretrial conference.

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/s/  
United States District Judge